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8 Attorneys for Plaintiff
9 KATHY DEOCAMPO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 KATHY DEOCAMPO,

13 Plaintiff,

14 v.

15 CALIFORNIA DEPARTMENT OF
16 CORRECTIONS, EDWARD S.
17 ALAMEIDA, JR., JEANNE S.
18 WOODFORD, AND DOES 1-25,
19 INCLUSIVE;

20 Defendants.

Case No. C 04-03018 MMC

STIPULATION REQUESTING
ADDITIONAL CONTINUANCE OF CASE
MANAGEMENT CONFERENCE AND
[PROPOSED] ORDER

Date: December 9, 2005

Time: 10:30 a.m.

Courtroom: 7

Judge: Honorable Maxine M. Chesney

21 Pursuant to the Court's Order and Civil L. R. 16-9, the parties jointly submit this
22 Stipulation requesting a continuance of the Case Management Conference on the grounds that all
23 parties are in the process of negotiating in good faith to reach a global settlement of all of
24 plaintiff's claims

25 DESCRIPTION OF THE CASE

26 Plaintiff was an employee for the California Department of Corrections, and most
27 recently was employed as a Correctional Case Records Analyst at San Quentin State Prison. The

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AND [PROPOSED] ORDER

1 plaintiff, Kathy DeoCampo, filed this lawsuit on July 26, 2004, alleging retaliation in violation of
2 Title VII, 42 U.S.C. § 2000(e), retaliation for First Amendment activities under 42 U.S.C. § 1983
3 and pendent claims under California Government Code §§ 12940, et seq. The defendants
4 answered on August 18, 2004.

5 The parties are working on a settlement that will involve a Stipulation and Rule 41(A)
6 Dismissal in this matter. There are still negotiations relating to the wording and language of the
7 Stipulation that will require additional time to resolve.

8 **STIPULATION**


9 Given that the parties continue to be engaged in good faith settlement negotiations, the
10 parties respectfully request this Court grant an additional stay to January 6, 2006.

11 RESPECTFULLY SUBMITTED,

12 THE SCOTT LAW FIRM

13
14 DATED: December 8, 2005


By:


JOHN HOUSTON SCOTT
Attorney for Plaintiff

16 BILL LOCKYER
17 Attorney General of the State of California
18 KAREN KIYO HUSTER
Deputy Attorney General

19 DATED: December 8, 2005


By:


KAREN KIYO HUSTER
Deputy Attorney General
Attorney for Defendants

ORDER

IT IS HEREBY ORDERED that the Case Management Conference set for December 9, 2005 be continued to January 6, 2006 at 10:30 a.m.
A joint case management statement must be filed no later than December 30, 2005.

DATED: December 9, 2005



HON. MAXINE M. CHESNEY
JUDGE OF THE
UNITED STATES DISTRICT COURT